

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**Case No. 1:22-cv-24066-KMM**

GRACE, INC., *et al.*,

*Plaintiffs,*

v.

CITY OF MIAMI,

*Defendant.*

/

**JOINT EXHIBIT LIST AND PLAINTIFFS' EXHIBIT LIST  
FOR PRELIMINARY INJUNCTION HEARING**

At the preliminary injunction hearing on March 29, 2023, Plaintiffs introduced 93 exhibits into evidence, the first 18 of which the Parties introduced as joint exhibits. All 93 exhibits were previously filed in support of Plaintiffs' Motion for Preliminary Injunction at ECF No. 24. Additionally, the City introduced 12 exhibits not previously filed in this case.

The Court directed Plaintiffs to file a notice of the above, in lieu of re-filing the exhibits themselves. The following lists the 18 Joint Exhibits and 75 Plaintiffs' Exhibits:

JOINT EXHIBITS		
ECF No.	Description	No. of Pages
<i>2022 Redistricting Cycle Materials</i>		
<i>Legislative Documents</i>		
24-1	Resolution 22-131 and Exhibit 1 Thereto	10
24-2	Master Report for Resolution 22-131	2
<i>Consultant Reports and Presentations</i>		
24-3	Nov. 18, 2021 Slide Presentation	18
24-4	Feb. 7, 2022 Slide Presentation	40

24-5	Feb. 7, 2022 Presentation Outline	10
24-6	Feb. 7, 2022 Cody Memo on Areas Moved in Feb. 7 Draft	10
24-7	Feb. 25, 2022 Slide Presentation	32
24-8	Mar. 11, 2022 Slide Presentation	15
24-9	Mar. 11, 2022 Initial Russell Plan Presentation	6
24-10	Mar. 24, 2022 Slide Presentation	15
<i>City Commission Meeting Transcripts</i>		
24-11	Tr. 1: Nov. 18, 2021	44
24-12	Tr. 2: Dec. 9, 2021	35
24-13	Tr. 3: Feb. 7, 2022	115
24-14	Tr. 4A: Feb. 25, 2022, Morning Session	66
24-15	Tr. 4B: Feb. 25, 2022, Afternoon Session	46
24-16	Tr. 5A: Mar. 11, 2022, Morning Session	92
24-17	Tr. 5B: Mar. 11, 2022, Afternoon Session	42
24-18	Tr. 6: Mar. 24, 2022	92

PLAINTIFFS' EXHIBITS		
ECF No.	Description	No. of Pages
<i>2022 Redistricting Cycle Materials (cont.)</i>		
<i>News Coverage of the 2022 Cycle</i>		
24-19	Joey Flechas, <i>Former Lawmaker Ends Contract to Redraw Miami Voting Districts After Questions Arose</i> , MIA. HERALD (Jan. 25, 2021), <a href="https://www.miamiherald.com/article248745895.html">https://www.miamiherald.com/article248745895.html</a>	3
24-20	Joey Flechas, <i>Miami Hires Redistricting Expert, City Hall Lobbyist to Redraw Voting Districts</i> , MIA. HERALD (Feb. 26, 2021), <a href="https://www.miamiherald.com/article249516260.html">https://www.miamiherald.com/article249516260.html</a>	4
24-21	Jim Turner, <i>Don't Cubbyhole Ken Russell as the White Man in the Race</i> , MIA. TIMES (June 22, 2021, updated Aug. 13, 2021), <a href="https://www.miamitimesonline.com/article_67457ba2-d36f-11eb-9e02-ff42b1ba1864.html">https://www.miamitimesonline.com/article_67457ba2-d36f-11eb-9e02-ff42b1ba1864.html</a>	3
24-22	Joshua Ceballos, <i>Joe Carollo: "So What?" If Redistricting Puts His Coconut Grove Home in District 3</i> , MIA. NEW TIMES (Mar. 4, 2022), <a href="https://www.miaminewtimes.com/news/new-miami-redistricting-proposal-moves-joe-carollo-coconut-grove-house-into-his-district-14018218">https://www.miaminewtimes.com/news/new-miami-redistricting-proposal-moves-joe-carollo-coconut-grove-house-into-his-district-14018218</a>	5
24-23	Joshua Ceballos, <i>City of Miami Sued for 'Racial Gerrymandering' in Redistricting Map</i> , WLRN (Dec. 15, 2022), <a href="https://www.wlrn.org/politics/2022-12-15/city-of-miami-sued-for-racial-gerrymandering-in-redistricting-map">https://www.wlrn.org/politics/2022-12-15/city-of-miami-sued-for-racial-gerrymandering-in-redistricting-map</a>	4
24-24	Joey Flechas, <i>Miami Commissioner Resigns a Few Days Early, Leaving District 2 Seat Open in New Year</i> , MIA. HERALD (Dec. 29, 2022), <a href="https://www.miamiherald.com/article270560797.html">https://www.miamiherald.com/article270560797.html</a>	4
24-25	Joey Flechas, <i>Voters in Miami's District 2 Will Choose Their Next Commissioner in Special Election</i> , MIA. HERALD (Jan. 8, 2023, updated Jan. 9, 2023), <a href="https://www.miamiherald.com/article270923747.html">https://www.miamiherald.com/article270923747.html</a>	3
<i>Other Materials from the 2022 Cycle</i>		
24-26	First Russell Resignation Letter (June 3, 2022)	2
24-27	Second Russell Resignation Letter (Dec. 29, 2022)	3
24-28	First ACLU-FL Letter (Feb. 25, 2022)	4
24-29	Second ACLU-FL Letter (Mar. 31, 2022)	4
24-30	Email from Supervisor of Elections' Office (Jan. 30, 2023)	3

<b><i>Expert Reports</i></b>		
24-31	Expert Report of Dr. Carolyn Abbott	34
24-32	Expert Report of Dr. Bryant Moy	63
<b><i>Plaintiff Declarations</i></b>		
24-33	Declaration of Carolyn Donaldson (GRACE, Inc.)	2
24-34	Declaration of Rebecca Pelham (Engage Miami, Inc.)	2
24-35	Declaration of Harold Ford (South Dade NAACP)	3
24-36	Declaration of Daniella Pierre (Miami-Dade NAACP)	2
24-37	Declaration of Clarice Cooper	2
24-38	Declaration of Jared Johnson	2
24-39	Declaration of Steven Miro	2
24-40	Declaration of Alexandra Contreras	2
24-41	Declaration of Yanelis Valdes	2
<b><i>News Coverage from Past Cycles</i></b>		
<i>1997 Cycle News Coverage</i>		
24-42	Alfonso Chardy, <i>Rights Group's Suit Wants Miami to Change Election System</i> , MIA. HERALD, Nov. 21, 1996, at 2B	2
24-43	Karen Branch, <i>Miami Group Pushing Hard for Single-Member Districts</i> , MIA. HERALD, Dec. 30, 1996, at 12A	2
24-44	Karen Branch, <i>Single-Member Districts Touchy Issue at City Hall</i> , MIA. HERALD, Jan. 20, 1997, at 2B	2
24-45	Manny Garcia, <i>Giving Miami Blacks a Voice</i> , MIA. HERALD, Mar. 13, 1997, at 1A	3
24-46	Manny Garcia, <i>Election Remap for Miami</i> , MIA. HERALD, Mar. 14, 1997, at 12A	2
24-47	<i>Panel Named to Draw Miami Districts</i> , MIA. HERALD, Mar. 15, 1997, at 2B	2
24-48	Editorial, <i>Where to Draw the Line</i> , MIA. HERALD, Mar. 15, 1997, at 10A	2
24-49	Karen Branch, <i>Professors Get Election Homework</i> , MIA. HERALD, May 5, 1997, at 2B	2

24-50	Alfonso Chardy, <i>Blue-Ribbon Panel Picks 2 Plans for Redrawing Districts</i> , Mia. Herald, June 19, 1997, at 1B	3
24-51	<i>Plan to Expand Miami Commission Draws Public Support</i> , MIA. HERALD, June 24, 1997, at 2B	2
24-52	Karen Branch, <i>Super-Strong Mayor for Miami?</i> , MIA. HERALD, June 25, 1997, at 1B	3
24-53	Karen Branch, <i>Miami Leaders Divided Over Redistricting Plan</i> , MIA. HERALD, June 27, 1997, at 3B	2
24-54	Karen Branch, <i>Districts: Back to Drawing Board</i> , MIA. HERALD, June 29, 1997, at 1B	3
24-55	Karen Branch, <i>Miami Commission Leans Toward 5-Member Panel</i> , MIA. HERALD, July 2, 1997, at 1B	3
24-56	Karen Branch, <i>Voting Districts to be Chosen Today</i> , MIA. HERALD, July 3, 1997, at 4B	2
24-57	Editorial, <i>Go for Seven</i> , MIA. HERALD, July 3, 1997, at 22A	2
24-58	Karen Branch, <i>Commissioners Choose 5-Seat Plan</i> , MIA. HERALD, July 4, 1997, at 1B	3
24-59	Karen Branch, <i>Miami Commission OKs 5 Voting Districts</i> , MIA. HERALD, July 11, 1997, at 1B	3
24-60	Liz Balmaseda, <i>Commission's Districting Logic Is Hard to Digest</i> , MIA. HERALD, July 12, 1997, at 1B	2
24-61	Enrique Patterson, <i>Power Games Rob African Americans</i> , MIA. HERALD, July 14, 1997, at 13A	2
24-62	Jim Hampton, <i>Schizoid Choices? No, It's Just Miami</i> , MIA. HERALD, July 20, 1997, at 2L	2
24-63	Andres Viglucci, <i>Abolition Attempt Crushed</i> , MIA. HERALD, Sep. 5, 1997, at 1A	3
24-64	Karen Branch & Dan Keating, <i>Vote Favors a Black Commissioner</i> , MIA. HERALD, Sep. 5, 1997, at 1B	3
24-65	Andres Viglucci, <i>Teele Wins Miami Seat</i> , MIA. HERALD, Nov. 5, 1997, at 1B	3
<i>2013 Cycle News Coverage</i>		
24-66	Kathleen McGrory, <i>New District Shifts Spur Controversy</i> , MIA. HERALD, June 8, 2012, at 1B	3
24-67	Kathleen McGrory, <i>Eastsiders Battle Redistricting</i> , MIA. HERALD, Feb. 14, 2013, at 5B	2
24-68	Kathleen McGrory, <i>Redistricting Foes Get Another Chance</i> , MIA. HERALD, Feb. 15, 2013, at 5B	2
24-69	Charles Rabin, <i>Commissioners Delay Vote on Redistricting</i> , MIA. HERALD, Apr. 26, 2013, at 5B	2

24-70	Charles Rabin, <i>Commission Votes Allow ‘Double-Dipping’ by 4 Employees</i> , MIA. HERALD, May 24, 2013, at 1B	3
<b><i>Other Materials from Past Cycles</i></b>		
<b><i>Legislative Documents</i></b>		
24-71	Resolution 97-495 and Ex. 1 Thereto	21
24-72	Resolution 03-448 and Substitute Ex. A Thereto	17
24-73	Resolution 13-208 and Substitute Ex. 1 Thereto	15
24-74	Agenda Item Summary Form for Resolution 13-208	3
24-75	Feb. 14, 2013 Commission Meeting Minutes	158
<b><i>Consultant Reports and Presentations</i></b>		
24-76	2013 Initial Report: <i>Redistricting the City of Miami Commission After the 2010 Census</i>	27
24-77	2013 Second Report: <i>Report on the Status of Redistricting and Proposed Redistricting Plan</i> , and Tabs 2 and 3 Attached Thereto	91
24-78	2013 Final Report Regarding the Proposed Redistricting Plan	6
24-79	2013 Presentation: <i>Redistricting Alternatives Compared</i>	20
<b><i>Maps (with Google Maps links, if applicable)</i></b>		
<b><i>Historical Plans</i></b>		
24-80	1997 Plan ( <a href="https://bit.ly/3wC1K8j">https://bit.ly/3wC1K8j</a> )	1
24-81	2003 Plan ( <a href="https://bit.ly/3Dn6mTH">https://bit.ly/3Dn6mTH</a> )	1
24-82	2013 Plan ( <a href="https://bit.ly/3wDsHsl">https://bit.ly/3wDsHsl</a> )	1
<b><i>2022 Cycle Plans</i></b>		
24-83	2022 Enacted Plan ( <a href="https://bit.ly/40b7OCK">https://bit.ly/40b7OCK</a> )	1
24-84	Feb. 7 Draft ( <a href="https://bit.ly/3wEowg4">https://bit.ly/3wEowg4</a> )	5
24-85	Feb. 22 Draft/Base Plan ( <a href="https://bit.ly/406t64d">https://bit.ly/406t64d</a> )	7
24-86	Russell Sketch	1
24-87	Initial Russell Plan ( <a href="https://bit.ly/3YaKzGR">https://bit.ly/3YaKzGR</a> )	2
24-88	Revised Russell Plan ( <a href="https://bit.ly/3XNuas4">https://bit.ly/3XNuas4</a> )	2

24-89	Reyes Plan ( <a href="https://bit.ly/3kL3kSB">https://bit.ly/3kL3kSB</a> )	2
24-90	2022 Precinct Map, <i>with 2022 Enacted Plan overlaid</i> ( <a href="https://bit.ly/3jjbRvQ">https://bit.ly/3jjbRvQ</a> )	1
24-91	2020 Census Voting Tabulation District (VTD) Map, <i>with 2022 Enacted Plan overlaid</i> ( <a href="https://bit.ly/40wASEv">https://bit.ly/40wASEv</a> )	1
<b><i>Miami-Dade County Elections Department District Demographic Analysis Reports</i></b>		
24-92	Feb. 1, 2022 District Demographic Analysis, <a href="https://www.miamidade.gov/elections/STATS/2022/2022-01-voter-registration-statistics-districts.pdf">https://www.miamidade.gov/elections/STATS/2022/2022-01-voter-registration-statistics-districts.pdf</a>	224
24-93	Feb. 1, 2023 District Demographic Analysis, <a href="https://www.miamidade.gov/elections/library/reports/voter-registration-statistics-districts.pdf">https://www.miamidade.gov/elections/library/reports/voter-registration-statistics-districts.pdf</a>	230

Respectfully submitted this 30th day of March, 2023,

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